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Senior Counsel

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PSC SC DOCKETING DEPT.

January 23, 2006

VIA HAND DELIVERY

Scott Elliott, Esquire Elliott & Elliott, PA 721 Olive Street Columbia, SC 29205



Re: Responses to SCEUC's Interrogatories and Request for Production in the matter captioned South Carolina Electric & Gas Company's Annual Review of Base Rates for Fuel Costs, Docket No. 2006-2-E

Dear Scott:

Thank you for working with us by granting an extension of time to respond to your first set of discovery requests. Also, as previously indicated, SCE&G will supplement the enclosed responses when certain information requested becomes available after the period under review ends on January 31, 2006.

Subject to our duty to supplement, enclosed herewith please find two (2) copies of SCE&G's responses to SCEUC's First Set of Interrogatories and First Request to Produce dated December 22, 2005.

In responding to the discovery requests, SCE&G does not in any manner whatsoever waive or intend to waive its right to object to the discovery requests on the grounds of relevancy to issues which are not related to fuel costs, which is the subject matter of the above-referenced proceeding. Moreover, in responding to the discovery requests, SCE&G does not specifically admit, intend to admit, or concede the relevancy of the discovery requests or SCE&G's responses contained therein. Further, SCE&G objects to any response that requests SCE&G to compile information or perform analysis that is not otherwise conducted or maintained in the normal course of business. Subject to and without waiving any objection, SCE&G has nonetheless provided responses to the discovery requests and has produced documents in response thereto.

Furthermore, SCE&G reserves its right to object to the admissibility of any of these documents on grounds of competency, relevancy, materiality and privilege, or any other ground available in law or equity of any of its responses provided or documents produced or referred to in its responses to SCEUC's discovery requests. In addition, SCE&G reserves its right to revise, correct, supplement or clarify any of its responses or documents produced or referred to in its responses to SCEUC's discovery requests.

Please note that several documents provided in the responses have been designated as **CONFIDENTIAL** and such documents have been so noted. This information is provided subject to the terms of our Confidentiality Agreement in this matter. We would appreciate you ensuring the protection of such information from disclosure.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Patricia B. Morrison

enclosures

cc: The Honorable Charles Terreni (without enclosures)

Shannon Hudson, Esquire (with enclosures)

Mitchell Willoughby, Esquire (without enclosures)

Catherine D. Taylor, Esquire (without enclosures)

Belton Zeigler, Esquire (without enclosures)